## Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

In re:	)	
	)	
5GAA Petition for Waiver to Allow	)	GN Docket No. 18-357
Deployment of Cellular Vehicle-To-Everythin	g )	
(C-V2X) Technology in the 5.9 GHz Band	)	

## JOINT REQUEST FOR EXTENSION OF COMMENT DEADLINE

Pursuant to Section 1.46 of the Commission's rules, 47 C.F.R. § 1.46, the Association of Global Automakers, Inc.<sup>1</sup> ("Global Automakers") and the Intelligent Transportation Society of America ("ITS America"), on behalf of their respective members, hereby request a fifteen-day extension of the opening comment deadline in the above-captioned proceeding. The current deadline for opening comments is January 11, 2019.<sup>2</sup> Pursuant to this request, comments would be due January 28, 2019.<sup>3</sup> The parties also request that the reply comment date be correspondingly extended to February 12, 2019. Global Automakers is making a similar request in a parallel Department of Transportation Proceeding.<sup>4</sup>

The Association of Global Automakers is a trade association based in Washington, D.C. that represents the U.S. operations of international motor vehicle manufacturers, original equipment suppliers, and other automotive-related companies and trade associations.

Office of Engineering and Technology and Wireless Telecommunications Bureau Seek Comment on 5GAA Petition for Waiver to Allow Deployment of Cellular Vehicle-to-Everything (C-V2X) Technology in the 5.9 GHz Band, Public Notice, GN Docket No. 18-357, DA 18-1231 (Dec. 6, 2018).

Saturday January 26<sup>th</sup> is fifteen days from January 11<sup>th</sup>. Global Automakers proposes to move the deadline to the next business day, Monday January 28<sup>th</sup>.

V2X Communications, Notice of Request for Comments, Docket No. DOT-OST-2018-0210 (Dec. 12, 2018), available at <a href="https://www.transportation.gov/sites/dot.gov/files/docs/policy-initiatives/automated-vehicles/327941/usdot-v2x-rfc.pdf">https://www.transportation.gov/sites/dot.gov/files/docs/policy-initiatives/automated-vehicles/327941/usdot-v2x-rfc.pdf</a>.

The parties respectfully submit that, while there are important issues at stake, a short extension is merited to enable auto industry stakeholders to evaluate the 5GAA Petition for Waiver and to provide the Commission robust, well-supported feedback to further its decision making. A short extension is necessary because of the confluence of the holidays and the International Consumer Electronics Show ("CES"), which runs from January 8-11, 2019<sup>5</sup> – the run-up to and filing deadline for opening comments. CES 2019 heavily features automotive technology,<sup>6</sup> and will involve executive-level participation from stakeholders across the transportation and auto ecosystem as well as support from in-house engineering and technical experts. These are precisely the personnel that would be involved in preparing comments on the 5GAA Petition for Waiver.

A short extension, as described herein, will ensure the Commission has the best record on which to make important decisions regarding the future of the 5.9 GHz band. Moreover, given the brevity of the extension, it will not prejudice any party or the Commission.

Accordingly, Global Automakers and ITS America respectfully submits that good cause exists for the requested extension, which should be granted.

\_

<sup>&</sup>lt;sup>5</sup> Consumer Technology Association, "Dates and Hours," https://www.ces.tech/Logistics/Dates-and-Hours.aspx.

<sup>&</sup>lt;sup>6</sup> See Consumer Technology Association, "2019 Schedule," https://www.ces.tech/schedule.aspx (59 events tagged as "Automotive").

## Respectfully submitted,

/s/ Scott Delacourt\_\_\_\_

Scott Delacourt
WILEY REIN LLP
1776 K Street, NW
Washington, DC 20006
202-719-7000
sdelacourt@wileyrein.com

Counsel for Global Automakers

Dated: December 21, 2018

/s/ Robert B. Kelly\_\_\_\_

Robert B. Kelly SQUIRE PATTON BOGGS (US) LLP 2550 M Street, NW Washington, DC 20037 202-626-6216 robert.kelly@squirepb.com

Counsel for ITS America

## **CERTIFICATE OF SERVICE**

I, Scott Delacourt, do hereby certify that on December 21, 2018, I served, via mail, a copy of this Joint Request for Extension of Comment Deadline on the following:

Sean T. Conway, Esq. Kelly A. Donohue, Esq. Mark A. Settle, P.E. WILKINSON BARKER KNAUER, LLP 1800 M Street, NW Suite 800N Washington, DC 20036 (202) 783-4141

Counsel to the 5G Automotive Association

\_/s/ Scott Delacourt\_\_\_\_\_\_
Scott Delacourt